

**ENGINEERING EXHIBIT EE-RM:**

**COMMENTS AND COUNTERPROPOSAL  
RULE MAKING TO AMEND  
FM TABLE OF ALLOTMENTS**

**MM DOCKET 01-255 - WRIGHT CITY, OKLAHOMA  
MM DOCKET 01-269 - ANTLERS, OKLAHOMA**

**NARRATIVE STATEMENT:**

This engineering statement has been prepared on behalf of Radio One Licenses, Inc. ("ROL"), licensee of Radio Station KTXQ-FM, at Gainesville, Texas. The purpose of this statement is to support Comments and Counterproposals in MM Dockets 01-255 at Wright City, OK and 01-269 at Antlers, OK. In addition, ROL wishes to call the Staff's attention to Proposals and Counterproposals in two recently closed dockets in nearby cities. Those dockets are: 01-216 at Valliant, OK and 01-209 at Broken Bow, OK.

In addition, since reply comments were filed in 01-216 & 01-209 it has come to ROL's attention that there was a prior filed but unpublished rule making proposing the allotment of Ch. 265A to Albion, OK (population 144 persons, 2000 Census) by Mr. Salsa. The Albion proposal is in conflict with the proposal by KTCY to allot 265A to Broken Bow in lieu of 285A. ROL still supports the KTCY proposal as a more efficient allotment of channels and opposes the Albion allotment.

**Comments of KTCY - MM Docket 01-209**

KTCY Licensing, Inc., licensee of KTCY on 285C1 at Pilot Point, Texas, filed comments and a counterproposal in MM Docket 01-209 at Broken Bow, OK. KTCY desires to upgrade its facility to 285C0. In order to facilitate its upgrade it requests the following changes:

Allotment of 265A in lieu of 285A at Broken Bow, OK, Docket 01-209.

Allotment of 227A in lieu of 284A at Antlers, OK, Docket 01-269.

A site restriction on 226A at Wright City, OK, Docket 01-255.

It should be noted that the Maurice Salsa is the proponent for Broken Bow, Wright City and Albion, OK, and that he filed supporting comments for Antlers, OK.

**MM Docket 01-255 - Wright City, OK**

That docket proposes the allotment of Channel 226A to Wright City, OK (population 848 persons, 2000 Census).

In comments filed in 01-209, KTCY has requested a site restriction on 226A at Wright City. In lieu of the KTCY counterproposal ROL requests substitution of Ch. 286A from a special reference point.

Figure 1 is an allowable area map for Ch. 286A at Wright City, OK. The proposed special reference point is located 5.6 km West-Southwest of the city of license. This point is located well within the 16 km city grade arc used for allotment of Class A channels. The proposed special reference coordinates for 286A are:

N. Latitude:	34°	02'	48"	NAD-27
W. Longitude:	95°	03'	41"	

**MM Docket 01-269 - Antlers, OK**

That docket proposes the allotment of Channel 284A to Antlers, OK (population 2,552 persons, 2000 Census) as its 3<sup>rd</sup> FM allotment.

It should be noted that Channels 222C2 & 272A are both currently allotted to Antlers and both are vacant waiting on the FCC to open up a filing window (Ch. 272A is scheduled for the next auction window). With regard to Channel 272A it was substituted (as of November 2000) for Channel 284A by Docket 98-198. It should also be noted that Channel 284A was originally allotted by Docket 91-232 and in February 1993 284A was declared to be a "First Come - First Serve" allotment for which despite its immediate availability for several years no one saw fit to file for and obtain a construction permit.

In comments filed in 01-209, KTCY has requested allotment of Ch. 227A in lieu of 284A at Antlers, OK.

Figure 2 is an allowable area map for Ch. 227A at Antlers, OK. The proposed special reference point is located 9 km Northwest of the city of license. This point is located well within the 16 km city grade arc used for allotment of Class A channels. The proposed special reference coordinates for 227A are:

N. Latitude:	34°	17'	01"	NAD-27
W. Longitude:	95°	41'	48"	

ROL supports the efforts of KTCY to oppose the allotment of Ch. 284A at Antlers. Moreover, ROL questions the need for any additional FM allotment at Antlers when there are currently two vacant allotments to meet the needs of that community.

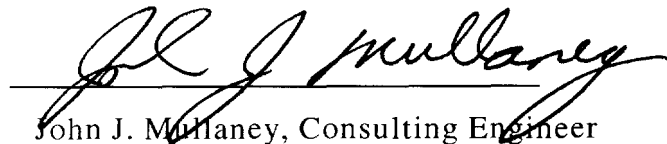
## **SUMMARY**

Radio One Licenses, Inc., licensee of Radio Station KTXQ-FM, at Gainesville, Texas herein files its Comments in MM Docket 01-255 & Docket 01-269. ROL continues to support its request to modify the pending proposal in MM Docket 01-216 at Valliant, Oklahoma, to (1) site restrict the reference point for Ch. 234C3 by 7.3 km to the East-Northeast of the city or (2) allot Ch. 234A in lieu of 234C3 if the site restriction is not adopted. ROL also supports the proposed changes filed by KTCY in MM Docket 01-209. In addition, ROL requests modification of the 232A allotment at Broken Bow and of 226A at Wright City, OK (differs from KTCY).

	<b>Proposed in NPRM</b>	<b>Proposal of Radio One Licenses</b>
<b>MM Docket 01-216</b>		
Valliant, OK	234C3	234C3 #* or 234A*
<b>MM Docket 01-209</b>		
Broken Bow, OK	<u>291C2</u> , 285A, 232A	<u>291C2</u> , 265A, 224A*
Pilot Point, TX	<u>285C1</u>	285C0
<b>MM Docket 01-255</b>		
Wright City, OK	226A	286A*
<b>MM Docket 01-269</b>		
Antlers, OK	<u>222C2, 272A</u> , 284A	<u>222C2, 272A</u> , 227A

\_\_\_\_\_ Existing Allotment, # site restricted, \* Proposed by ROL

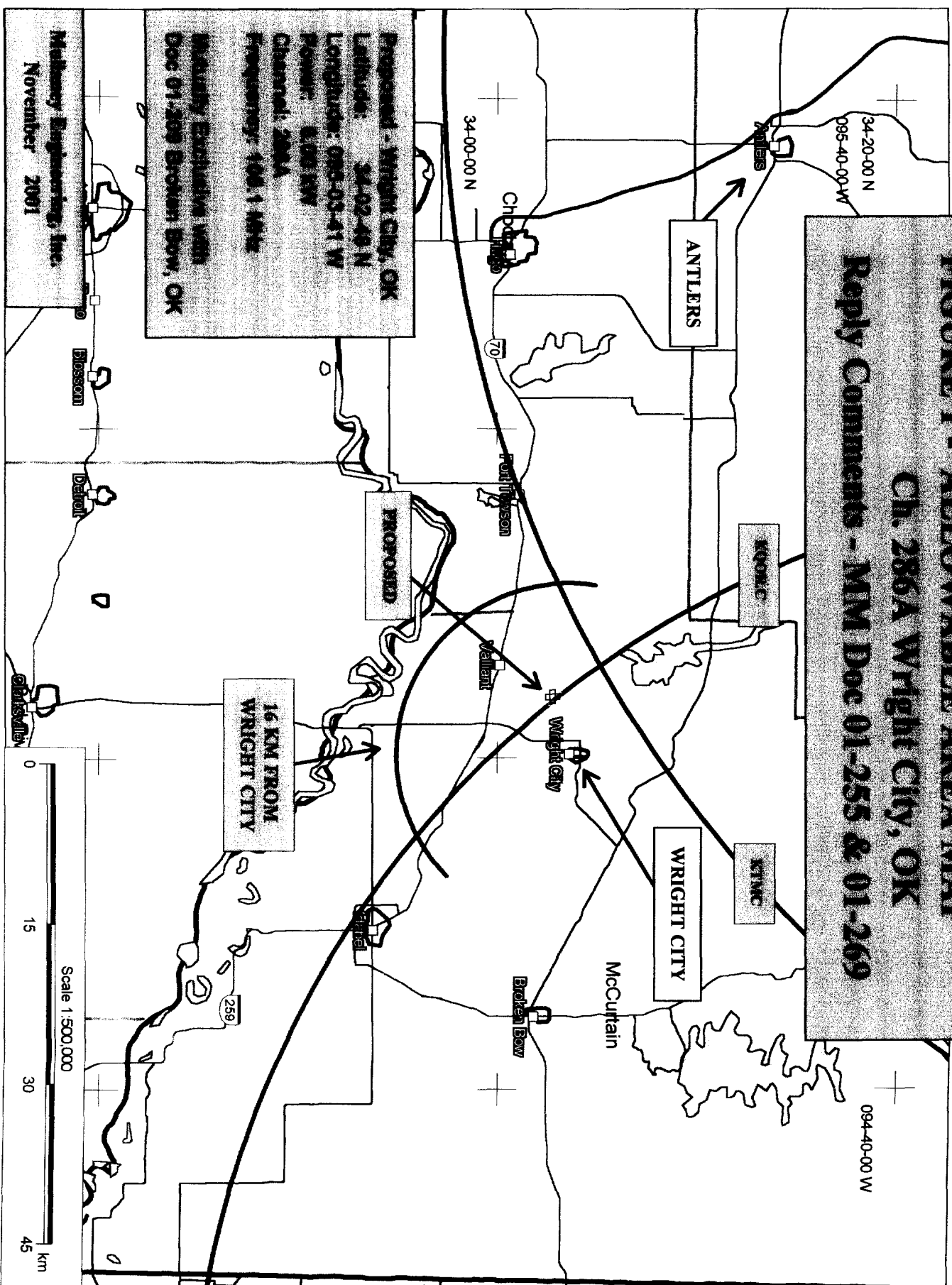
Radio One believes that modification of the NPRMs as proposed herein will serve the public interest by allotting new channels to Valliant, Broken Bow, Wright City & Antlers, OK and by permitting a grant of the KTXQ-FM change of site application & KTCY a grant of a C0 upgrade. If the Class A channel is allotted, as requested herein, to Valliant, OK, Radio One will file a Form 175 for the Valliant FM facility at the appropriate time.



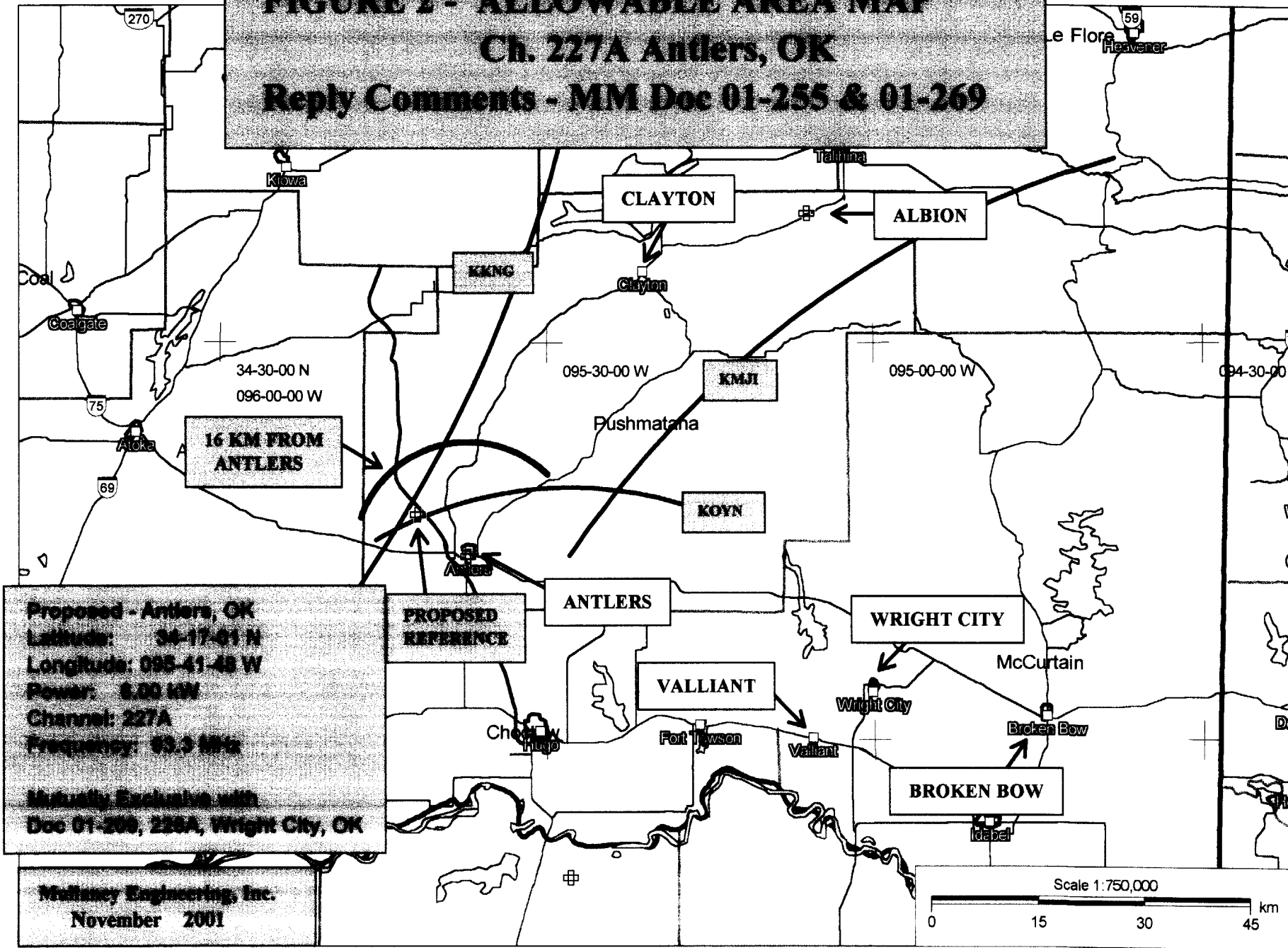
John J. Mullaney, Consulting Engineer

November 19, 2001.

# FIGURE 1 - ALLOWABLE AREA MAP CH. 286A Wright City, OK Reply Comments - MM Doc 01-255 & 01-269



**FIGURE 2 - ALLOWABLE AREA MAP**  
**Ch. 227A Antlers, OK**  
**Reply Comments - MM Doc 01-255 & 01-269**





## CERTIFICATE OF SERVICE

I, Margaret Truitte, a secretary in the law firm of Davis Wright Tremaine LLP, do hereby certify that I have on this 19th day of November, 2001, caused to be mailed by first class mail, postage prepaid, copies of the foregoing "Comments and Counterproposal" to the following:

R. Barthen Gorman  
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(Petitioner for Antlers)

Maurice Salsa  
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(Petitioner for Valliant, Wright City, and Broken Bow)

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(Petitioner for Broken Bow)

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Margaret Truitte